

Mar 18, 2025

s/ K. Reed

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the
Eastern District of WisconsinIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Devices further described in Attachment A, located at
the WCSO Computer Forensic Lab (CFL) located at
515 West Moreland Boulevard, Waukesha, WI 53188

Case No. 25 MJ 38

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Eastern District of Wisconsin, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
Title 18 U.S.C. § 371;	Conspiracy
Title 18 U.S.C. 1751(c) and (d); and	Presidential assassination
Title 18 U.S.C. §2332a(a)(2)	Weapons of mass destruction

The application is based on these facts:
See attached Affidavit☒ Continued on the attached sheet.☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Justin Mosiman, FBI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone (specify reliable electronic means).

Date: 03/18/2025



Judge's signature

City and state: Milwaukee, Wisconsin

Honorable William E. Duffin, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Justin Mosiman, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for electronic devices, as described in Attachment A, received from the Waukesha County Sheriff's Office for the things described in Attachment B.

2. I am a Special Agent with the Federal Bureau of Investigation and have been since May 2019. I have also been a Special Agent Bomb Technician since February 2021. I am currently assigned to the Joint Terrorism Task Force in Milwaukee, where I investigate violations of federal law. I have investigated and assisted in the investigation of matters involving, violations of federal law related to domestic and international terrorism and weapons of mass destruction including the service of search and arrest warrants. Prior to my employment with the FBI, I served in the United States Navy for six years as an Explosive Ordnance Disposal Technician and was employed as a contractor with the Department of Defense as an Explosive Ordnance Disposal Subject Matter expert for six additional years.

3. The facts in this affidavit are known to me through my personal knowledge, training, experience, and through information provided to me by other law enforcement officers in the course of their duties, whom I consider to be truthful and reliable.

4. This affidavit is intended to show there is sufficient probable cause for the requested warrant and does not set forth all my knowledge about this matter. Based on the facts set forth in this affidavit, there is probable cause to believe that the following violations of federal law have been committed:

a. **Title 18 U.S.C. § 371** (Conspiracy) makes it unlawful for two or more persons to conspire to commit any offense against the United States.

b. **Title 18 U.S.C. § 1751(c) and (d)** (Presidential assassination) make it unlawful to attempt to kill the President or Vice-President of the United States or for two or more persons to conspire to kill the President or Vice-President of the United States.

c. **Title 18 U.S.C. § 2332a(a)(2)** (Use of weapons of mass destruction) makes it unlawful for any person to use, threaten, or attempt or conspire to use, a weapon of mass destruction against any person within the United States utilizing interstate or foreign commerce. The term “weapon of mass destruction” is defined in 18 U.S.C. § 2332a(c)(2)(a) to include any destructive device as defined in 18 U.S.C. § 921(a)(4).

5. There is probable cause to search the items described in Attachment A for evidence further described in Attachment B.

PROBABLE CAUSE

6. On February 28, 2025, at approximately 9:44 a.m., Donald Mayer’s mother, J.M., contacted the Waukesha County Communications Center to request a welfare check at a residence in Waukesha, Wisconsin. J.M. stated they were unable to contact the family and learned Nikita Casap had not attended high school for approximately two weeks. Additionally, the School Resource Officer (SRO) for Waukesha West High School also requested a welfare check and advised that Casap had been absent for approximately two weeks.

7. On February 28, 2025, law enforcement officers from the Waukesha County Sheriff’s Office (WCSO) conducted a welfare check at approximately 10:00 a.m. on Nikita Casap,

his mother, Tatiana Casap (Tatiana), and his step-father, Donald Mayer. The Deputy was unable to make contact with the residents and received information from neighbors that they had not seen the family recently. The Deputy contacted Mayer's work manager and received information that Mayer had not been to work since February 13, 2025 but had communicated via text message from February 13 to 24, 2025, claiming to be sick and unable to work.

8. On February 28, 2025, at approximately 1:40 p.m., WCSO Deputies entered the residence through the garage and found Tatiana Casap deceased, likely from gunshot wounds, and covered with blankets. WCSO secured the residence.

9. WCSO requested emergency cell phone pings from AT&T for Donald Mayer and Nikita Casap. AT&T provided information that both phones were located in the area of Laramie, Wyoming.

10. A neighbor immediately to the west of the residence, P.F., provided information to WCSO that there had been little activity at the residence for two weeks. On February 23, 2025, P.F. observed Mayer's black SUV driving away from the residence.

11. During a secondary search of the residence, Donald Mayer was located, deceased from gunshot wounds, in the first-floor office and also covered in blankets. During the search, a receipt was found for a .357 magnum revolver, but the firearm was not located in the residence.

12. Based on information obtained by WCSO during the course of their investigation, including security footage, cell-phone records, and witness statement, Mayer and Tatiana are believed to have been killed on February 11, 2025, at approximately 6:30 p.m. and 8:40 p.m., respectively.

13. WCSO reviewed ping records, which showed that Casap's phone was stationary on February 24, 2025, between 2:20 and 2:50 p.m. at the "World's Largest Truckstop" located in

Walcott, Iowa. The Walcott Police Department provided security footage of Casap operating Mayer's black Volkswagen Atlas SUV and was alone, traveling with their family dog.

14. On February 28, 2025, at approximately 10:00 p.m., Mayer's vehicle was listed as stolen and Casap was entered as a missing juvenile in NCIC. At 11:25 p.m. that day, the WaKeeney Kansas Police Department (WPD) conducted a traffic stop on Mayer's SUV. An unloaded .357 magnum revolver was observed in plain view on the front passenger floorboard. Boxes of .357 magnum and .38 special ammunition, Mayer and Tatiana's wallets, large amount of U.S. currency and Euros, and two cell phones belonging to Mayer and Casap were found in the vehicle. WPD ultimately arrested Nikita Casap for theft of a vehicle and possession of a firearm and seized his cell phone incident to his arrest.

15. On March 3, 2025, WCSO obtained a search warrant for Casap's cell phone. During their review, WCSO identified material on the phone related to the "The Order of Nine Angles" (O9A).¹ WCSO review of the phone identified possible usernames for Casap including "accelerationist14" and "Awoken."

16. On March 4, 2025, WCSO executed a search warrant for Mayer's Volkswagen Atlas. During the search, the following items were located in the vehicle: a pried open safe; women's jewelry; electronics, including iPads, cell phones, and laptops; approximately \$14,000; banking documents; hard drives and external storage devices; a SimpliSafe home security sensor; and a YI security camera with a micro SD card.

¹ The Order of Nine Angles (O9A) is a network of individuals holding neo-Nazi racially motivated extremist views. O9A advocates for the use of violence and terrorism to overthrow governments and destroy modern civilization.

17. WCSO reviewed Casap's phone and saw images and communications that referenced a self-described manifesto regarding assassinating the president, making bombs, and terrorist attacks.

18. During WCSO review of Telegram messages between February 14 and 24, 2025, messages in Russian were identified from phone notifications and translated, including:

- a. "Reply to them all and say [you] got sick."
- b. "Take [drag] them to the basement."

19. WCSO review of the YI security camera and micro SD card that were found in the Volkswagen Atlas revealed footage from February 16 to 22, 2025, including Casap lighting (what are believed to be scented) candles and rummaging through a desk while near a mound of blankets and pillows covering Mayer's body.

Ideology

20. On March 7 to 8, 2025, a preliminary review of the device image by the FBI for exigent threats revealed the following conversations:

- a. TikTok, December 6-8, 2024:
 - **Awoken** (UID: 7087032891993605163): Yk it's kinda interesting how I told this girl best friend about how I follow O9A teachings and whatnot and she was pretty chill about it
 - **Awoken**: I feel like mostly people would freak out lol
 - **Awoken**: Hbu, does anyone irl know you're into O9A, Charlie Manson?
 - **Mystic Physis** (UID: 7399786784584369195): well they know
 - **Awoken**: My parents don't know lol, they would take away my phone away if they did. Especially since last year fbi visited ²lol
 - **Mystic Physis**: my parents know

² The FBI interviewed the Casap family in November of 2023 for unrelated internet IP activity. All members of the family denied the IP activity and Agents were allowed to view devices and internet history and found no corroboration of the alleged internet activity.

- **Awoken:** Are you over 18? Cuz I'm not, thus they still have control to take away stuff
- **Mystic Physis:** me neither
- **Awoken:** And your parents don't care!?!
- **Mystic Physis:** no

b. TikTok, December 27, 2024:

- **Nihilus** (UID: 7412693046985114629): He dude
- **Nihilus:** Do yk any telegram group where niners and dreccs can interact and exchange info?
- **Awoken:** Sorry no, I'm mostly in NS/WP crew tg groups lol
- **Awoken:** If you do find any, it'd be nice if u tell me
- **Nihilus:** What's WP
- **Awoken:**
https://en.m.wikipedia.org/wiki/National_Socialism_-_White_Power
- **Nihilus:** Oh white power
- **Nihilus:** Cool
- **Awoken:** Do you know why O9A telegram groups?
- **Nihilus:** You mean any O9A telegram groups?
- **Awoken:** Yeah typo lol
- **Nihilus:** Oh not a group
- **Nihilus:** But a channel
- **Nihilus:** you can find documents there
- **Awoken:** alright send
- **Nihilus:** <https://t.me/c/2300591097/3>
- **Awoken:** Can you send me the link to the account?
- **Awoken:** It says I can't access the message
- **Nihilus:** How can I do that?
- **Nihilus:** wait a sec
- **Awoken:** Here's mine tg username @accelerationist14
- **Nihilus:** I sent a msg

c. Telegram, January 21, 2025:

- **@accelerationist:** "what country do you think will get the blame for this?"
- **Unknown:** Russia will be blamed for it, this is the goal

- **@accelerationist**: “When the time comes for me to send my manifesto to you (so that you can spread it online), should it be pdf? And also you won’t anyhow change or modify the manifesto”
- **Unknown**: Write on a piece of paper and take a picture of it

21. FBI personnel performing the preliminary review also saw images of a three-page document entitled, “Accelerate the Collapse.” The images, which appear to be screengrabs of a document that was displayed on the phone, were created on February 28, 2025. The document appears to be the manifesto referenced by @accelerationist, in the messages with the unknown user in the above paragraph, calling for the assassination of the President of the United States in order to foment a political revolution in the United States and “save the white race” from “Jewish controlled” politicians. The third page of the document contained images of Adolf Hitler with text “HAIL HITLER HAIL THE WHITE RACE HAIL VICTORY.”

22. Excerpts from the three-page document include:

- “It is clear that jews control all of the White countries, and it is clear that they promote White genocide and degeneracy. This for the white race to survive, it is necessary to accelerate the collapse of the countries. Jewish occupied governments must fall. The white race cannot survive unless America collapses.”
- “As to why, specifically Trump, I think it’s obvious. By getting rid of the president and perhaps the vice president, that is guaranteed to bring in some chaos. And not only that, but it will further bring into the public the idea that assassinations and accelerating the collapse are possible things to do.”
- “Now what if you say you aren’t capable of committing these acts? This is perfectly fine for now, the next best thing you can do is to tribe and train. Make connections, join White conscious martial arts clubs, because once America collapses there would have to be a network that can take its place.”

d. “Reading is also important. Read Siege³ by James Mason, Militant Accelerationism/The Hard Reset⁴ by Terrorgram, Redstone Killers-good source regarding sabotage, A Call To Arms – Juraj Krajcik. The American Futurist⁵ have a lot of really good articles. They’re former Atomwaffen⁶ guys, and there is sure much to learn from the success and mistakes of Atomwaffen.”

e. “Use Yandex, to find bomb making instructions and those books...if you already know the reality of situation, that there is no political solution, then I would just focus on reading practical material. Such as the ways to do attacks (Terrorgram publications and Redstone Killers talks of this) ...if you already know all of that and are just waiting for a signal, well then this is your signal to act. Jewish politicians and billionaires have names and addresses. Find out what they are and kill them.”

f. “As a side note, the other attacks that may occur, I have no idea what they are/who they target. I have no idea even if they are same ideology as I. Point being this manifesto is specifically for the attack that targets Trump.”

g. “There’ll never be a perfect revolutionary situation that springs up out of nowhere. We need to create a revolutionary situation ourselves. I do agree that only if terrorism is sustained over a period of time can it be effective. In short, huge amounts of violence will be required. Long past are the days when we can vote for a Hitler to save us. It is time we stop waiting. The best day to commit an attack is today, the next best is tomorrow.”

h. “It is time that we lead the way to the System collapse. Do absolutely anything you can that will lead to the collapse of America or any other country you live in. This is the only way that we can save the White race. White Revolution is the only solution.”

³ Siege by James Mason is a series of racially motivated violent extremism essays advocating for the use of terrorism to accelerate a white-race revolution.

⁴ On January 13, 2025, the United States Department of State designated the Terrorgram Collective as Specially Designated Global Terrorists.

⁵ The American Futurist is an online media platform promoting violent extremism including articles and guides for conducting acts of terrorism.

⁶ Atomwaffen Division (AWD) is a neo-Nazi white supremacist extremist organization advocating for the use of violent terrorism to accelerate the social collapse.

23. Nihilistic Violent Extremists (NVEs) are individuals who engage in criminal conduct within the United States and abroad, in furtherance of political, social, or religious goals that derive primarily from a hatred of society at large and a desire to bring about its collapse by sowing indiscriminate chaos, destruction, and social instability. NVEs work individually or as part of a network with these goals of destroying civilized society through the corruption and exploitation of vulnerable populations, which often include minors.

24. NVEs, both individually and as a network, systematically and methodically target vulnerable populations across the United States and the globe. NVEs frequently use social media communication platforms to connect with individuals and desensitize them to violence by, among other things, breaking down societal norms regarding engaging in violence, normalizing the possession, production, and sharing of gore material, and otherwise corrupting and grooming those individuals towards committing future acts of violence.

25. Those individuals are targeted online, often through synchronized group chats. NVEs frequently conduct coordinated extortions of individuals by blackmailing them so they comply with the demands of the network. These demands vary and include, but are not limited to, self-mutilation, online and in-person sexual acts, harm to animals, sexual exploitation of siblings and others, acts of violence, threats of violence, suicide, and murder.

26. Historically, NVEs systematically targeted vulnerable individuals by grooming, extorting, coercing, and otherwise compelling through force, or the threat of force, the victims to mutilate themselves or do violence, or threaten violence, to others and either film or photograph such activity. The members of the network have edited compilation photographs or videos of targeted individuals, shared the photographs and videos on social media platforms for several reasons, including to gain notoriety amongst members of the network, and spread fear among those

targeted individuals for the purpose of accelerating the downfall of society and otherwise achieving the goals of the NVEs.

27. NVEs networks have adopted various monikers to identify themselves. The networks have changed names over time, which has led to the creation of related networks. Although the networks change names and use a variety of different social media platforms, the core members and goals remain consistent and align with the overarching threat of NVE.

Conspiracy

28. FBI personnel performing the preliminary review also saw an image with information of how to utilize a drone as an attack drone. The information contains directions on how to extend the range of an attack drone by using repeater drones and ways to avoid detection, such as making a drone from a kit rather than a commercial off-the-shelf brand. The instructions provide direction to use a small dropper to drop an explosive, Molotov cocktail, or very strong topical poison. Additionally, to avoid detection, the instructions advise to not bring a cell phone.

29. FBI personnel performing the preliminary review also saw a Telegram direct message conversation with “ПОМАН БІКТОВІЧ,” who writes in Cyrillic and has the Ukrainian mobile telephone number +380 50 259 5318. In the conversation, Accelerationist (Casap) states:

- “How long will I need to hide before I will be moved to Ukraine? 1-2 months?”
- “Also I probably should brush up on my Russian, because I can understand just fine but speaking is harder lol”
- “So while in Ukraine, I’ll be able to get a normal job and have a normal life? Even if when it’s found out I did it?”
- “Do the other 10 people also have similar beliefs to I? Or are they different?”
- “Assuming that my parents won’t leave...” [remainder of message cut off]

30. FBI personnel performing the preliminary review also saw a Telegram direct message conversation with “Angel of Death” (username: @AngelOkfDeath) that contained the following messages from Casap (using the username “Accelerationist”):

- “A drone with a dropping mechanism”
- “Yeah. I still have to ask @asellfuck regarding what should be the caring capacity of the drone (unless he told you already).”
- “Anyway, yeah so the drone would drop a bomb (with nuts, bolts, needles). So I will need that.”
 - Angel of Death: “The total amount will be 1200-1500\$ Payment by ton btc⁷ usdt? Bike waiting time is 7-10 days The IED-2000-500 model is reserved for you, do you confirm the purchase?”
- “Yeah I’m aware you will only start working once I’ve paid you. So I’ll text you when I can pay. That includes the headphones as well? Quality one to protect hearing from gunshots of a .357 magnum. Just making sure”
- “[bitcoin wallet address] That’s your bitcoin address, correct? Just making sure.”
- “So once the transfer is complete and I’ll be able to pick up it up. Is it just the drone with the dropping mechanism? Or also explosives?”
- “How much will 200 wheels cost for this bike?”

31. FBI personnel performing the preliminary exigency review also saw a direct message conversation with an individual, “forest”, who writes in Cyrillic, that contained messages to obtain a different license plate and coordinates along with driving directions from a current location in southeast Wyoming through Kansas to a location near Pumpkin Center, Oklahoma. Additionally, username alexander802 (Casap) states, “and then from there to Eureka, California, it is 30 hours. You think I’ll have enough time?”

32. FBI personnel performing the preliminary review also saw images created on February 28, 2025, of the front and back of Mayer’s American Airlines AAdvantage credit card, PNC Bank debit card, BMO Harris Bank debit card, armed forces identification card, and driver’s

⁷ From context, “btc” here refers to the cryptocurrency bitcoin.

license. FBI personnel also saw an image displaying the username and password for a BMO Bank account.

33. On March 10, 2025, WSCO interviewed a classmate of Casap. The classmate stated that Casap would send “gore edit” videos that included flashing gory and war images put to Russian music via Snapchat. Casap told the classmate he intended to kill his parents by shooting them but did not have access to a gun. He later told the classmate that he would befriend someone with a gun and then steal the gun. Casap told the classmate he was in contact with a male in Russia via Telegram and they were planning to overthrow the government of the United States and assassinate President Trump. Casap told the classmate that when they saw 10 consecutive attacks in the news, it would have been him.

34. In sum, Casap appears to have written a manifesto calling for the assassination of the President of the United States. He was in touch with other parties about his plan to kill the President and overthrow the government of the United States. And he paid for, at least in part, a drone and explosives to be used as a weapon of mass destruction to commit an attack. The killing of his parents appeared to be an effort to obtain the financial means and autonomy necessary to carrying out his plan. Other parties, with whom Casap was in contact, appear to have been aware of his plan and actions and to have provided assistance to Casap in carrying them out.

IDENTIFICATION OF THE DEVICES TO BE EXAMINED

35. The property to be searched includes a series of devices which were seized pursuant to state search warrants in the State of Wisconsin Waukesha County Circuit Court and executed by Waukesha County Sheriff’s Office (WCSO) as described below.

36. On February 28, 2025, and March 3, 2025, respectively, search warrants were signed in the State of Wisconsin Waukesha County Circuit Court which authorized the search of

the residence located at S38W27056 Cider Hills Drive, Waukesha, Wisconsin. During the execution of these warrants, the following items were seized:

- a. WCSO Item A1 – Computer, HP Pavilion 523W, S/N MX24490881
- b. WCSO Item A2 – Computer, HP Tower MX892907YS
- c. WCSO Item A3 – Computer, HP Prodesk
- d. WCSO Item A4 – Hard Drive, Cloud Key F492BF732E03
- e. WCSO Item A5 – Laptop, Apple Laptop Model A2179, S/N FVFDNUE2MNHR
- f. WCSO Item A6 – Laptop, Apple Laptop Model A1466 S/N C17QP4LRG940
- g. WCSO Item A8 – Computer, HP Pavilion Slimline
- h. WCSO Item A10 – Laptop, Panasonic NIB Laptop
- i. WCSO Item A12 – Cell Phone, Cell phone from cabinet in Kitchen, iPhone A1661
- j. WCSO Item A13 – Camera
 - i. Sony Cyber Shot
 - ii. Kodak AZ421
 - iii. Coolpix B500
- k. WCSO Item A14 – Computer Tablet, iPad in Purple Case
- l. WCSO Item A15 – Computer Tablet, Blue iPad Air, Heavy Damage
- m. WCSO Item B1 – (6) Home Security Cameras recovered from cabinet in Dining Room area
 - i. Yi Camera Identifier: YFUSY94RZI

ii. Yi Camera Identifier: 47USYMDEYT

iii. Yi Camera Identifier: 47USYMDEYT

iv. Yi Camera Identifier: YFUSY941L1

v. Yi Camera Identifier: 47USY6I9XN

vi. SimpliSafe Camera Model: CM006, Identifier: F1157F53

n. WCSO Item B6 – DVR, Ubiquiti Video MAC ID 1633F802AA84FFC93
with Cord

o. WCSO Item D1 – Trail Camera, Campak Model T40 Camo Front, Black
Back

p. WCSO Item D2 – Trail Camera, Ronitry Brand, Camo Front, Black Back

37. Also on March 3, 2025, a search warrant was signed in the State of Wisconsin Waukesha County Circuit Court which authorized the search of the following two devices, which were seized by WaKeeney Kansas Police Department during their arrest of Nikita Casap on February 28, 2025:

a. WCSO Item E3 – Cell phone, Gray iPhone in a green and gold Lonasic
Brand Case

b. WCSO Item E4 – Cell phone, Rose gold with Gold trim iPhone in a Black
Leather Case

38. On March 3, 2025, a search warrant was signed in the State of Wisconsin Waukesha County Circuit Court which authorized the search of a black 2018 Volkswagen Atlas with Wisconsin Registration AUJ-4219 and VIN: 1V2MR2CA2JC591194 registered to Donald S. Mayer, date of birth March 16, 1973. During the execution of the warrant, the following items were seized:

- a. WCSO Item G1 – Hard Drive, WD External Hard Drive
- b. WCSO Item G10 – External Storage
 - i. (6) Thumb Drives
 - ii. (4) Micro SD Cards
 - iii. (4) SD Cards
- c. WCSO Item G14 – Two Digital Watches, Apple watches
- d. WCSO Item G16 – Cell phone, Black iPhone Model A1429
- e. WCSO Item G17 – Cell phone, Black Apple iPhone in clear case w/ Nikita's School ID
- f. WCSO Item G18 – Laptop, ThinkPad Lenovo S/N PFZ0BS3
- g. WCSO Item G19 – Laptop, ThinkPad Laptop
- h. WCSO Item G20 – Tablet, iPad in Blue Case A2270, H9DH0NQQ1GJ
- i. WCSO Item G21 – Digital Book, Kindle
- j. WCSO Item G37 – Laptop, MacBook Pro Model A1398 S/N C02NM0TRG3QN
- k. WCSO Item G38 – iPad, iPad from Waukesha School District
- l. WCSO Item G39 – iPad, iPad Silver Model A139, S/N DKV90EKDFJ0
- m. WCSO Item G40 – iPad, Model A1701 S/N DMPVR5YBHP51, Black Leather Case
- n. WCSO Item G41 – Laptop, Dell Latitude 3390 2 IN 1 S/N B7TY1P2
- o. WCSO Item G42 – Laptop, HP Spectre X360 S/N SCD93863SF
- p. WCSO Item G43 – iPad, iPad Air in Colorful Case, Model AZ588 S/N HC3024WWK9

q. WCSO Item G44 – iPad, Rose Gold iPad, Model A1566, S/N DLXNKBNHG5W0

r. WCSO Item G45 – iPad, Rose Gold iPad, Model A1566, S/N DMQRTAH8GSW0

s. WCSO Item G46 – iPad, Silver iPad Model A2327 S/N L3DONRLL2W

t. WCSO Item G56 – Surveillance Camera, Yi Camera and SimpliSafe Sensor

39. WSCO Items A1-A6, A8, A10, A12-A15, B1, B6, D1, D2, E3, E4, G1, G10, G14, G16-G21, G37-G46, and G56 (collectively the “Devices”) are currently located at the WCSO Computer Forensic Lab (CFL) located at 515 West Moreland Boulevard, Waukesha, WI 53188.

40. The applied-for warrant would authorize the forensic examination of the Devices for the purpose of identifying electronically stored data particularly described in Attachment B.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

41. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. I know it is common for individuals to use multiple devices that can connect to the internet. Information from devices can be backed up via online services directly or indirectly which may then be linked or synchronized with other devices. Cameras can store data natively and via removeable memory. Cameras are often used by individuals to video record manifestos and perform target reconnaissance. Security cameras can store data in various ways that include natively on the device, removeable media, and via internet services. The nature of this matter involves radicalization materials that can be stored as images or electronic documents which can be viewed by the user on devices with a screen and operating system. Additionally, the modern “internet-of-things” connects multiple devices that

connect to the same internet network to store and access data across devices. Smart-devices that include wearables retain information natively in order to synchronize with cloud-based accounts and linked devices when re-connected. Digital video recorders (DVR) have native storage media that can store user programming including security and surveillance footage. This information can sometimes be recovered with forensics tools.

42. As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the Device was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the Device because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).
- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on a storage medium that is necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a

review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.

e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

f. I know that when an individual uses an electronic device to facilitate or further a crime, the individual's electronic device will generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The electronic device is then an instrumentality of the crime because it is used as a means of committing the criminal offense. The electronic device is also likely to be a storage medium for evidence of crime. From my training and experience, I believe that an electronic device used to commit a crime of this type may contain: data that is evidence of how the electronic device was used; data that was sent or received; and other records that indicate the nature of the offense.

43. Based on the foregoing, the warrant I am applying for would permit the examination of the devices consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

44. Because this warrant seeks only permission to examine a device already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

ATTACHMENT A

The property to be searched are:

1. WCSO Item A1 – Computer, HP Pavilion 523W, S/N MX24490881
2. WCSO Item A2 – Computer, HP Tower MX892907YS
3. WCSO Item A3 – Computer, HP Prodesk
4. WCSO Item A4 – Hard Drive, Cloud Key F492BF732E03
5. WCSO Item A5 – Laptop, Apple Laptop Model A2179, S/N FVFDNUE2MNHR
6. WCSO Item A6 – Laptop, Apple Laptop Model A1466 S/N C17QP4LRG940
7. WCSO Item A8 – Computer, HP Pavilion Slimline
8. WCSO Item A10 – Laptop, Panasonic NIB Laptop
9. WCSO Item A12 – Cell Phone, Cell phone from cabinet in Kitchen, iPhone A1661
10. WCSO Item A13 – Cameras
 - a. Sony Cyber Shot
 - b. Kodak AZ421
 - c. Coolpix B500
11. WCSO Item A14 – Computer Tablet, iPad in Purple Case
12. WCSO Item A15 – Computer Tablet, Blue iPad Air, Heavy Damage
13. WCSO Item B1 – (6) Home Security Cameras recovered from cabinet in Dining Room area
 - a. Yi Camera Identifier: YFUSY94RZI
 - b. Yi Camera Identifier: 47USYMDEYT
 - c. Yi Camera Identifier: 47USYMDEYT
 - d. Yi Camera Identifier: YFUSY941L1

- e. Yi Camera Identifier: 47USY6I9XN
 - f. SimpliSafe Camera Model: CM006, Identifier: F1157F53
14. WCSO Item B6 – DVR, Ubiquiti Video MAC ID 1633F802AA84FFC93 with Cord
 15. WCSO Item D1 – Trail Camera, Campak Model T40 Camo Front, Black Back
 16. WCSO Item D2 – Trail Camera, Ronitry Brand, Camo Front, Black Back
 17. WCSO Item E3 – Cell phone, Gray iPhone in a green and gold Lonasic Brand Case
 18. WCSO Item E4 – Cell phone, Rose gold with Gold trim iPhone in a Black Leather Case
 19. WCSO Item G1 – Hard Drive, WD External Hard Drive
 20. WCSO Item G10 – External Storage
 - a. (6) Thumb Drives
 - b. (4) Micro SD Cards
 - c. (4) SD Cards
 21. WCSO Item G14 – Two Digital Watches, Apple watches
 22. WCSO Item G16 – Cell phone, Black iPhone Model A1429
 23. WCSO Item G17 – Cell phone, Black Apple iPhone in clear case w/ Nikita's School ID
 24. WCSO Item G18 – Laptop, ThinkPad Lenovo S/N PFZ0BS3
 25. WCSO Item G19 – Laptop, ThinkPad Laptop
 26. WCSO Item G20 – Tablet, iPad in Blue Case A2270, H9DH0NQQ1GJ
 27. WCSO Item G21 – Digital Book, Kindle
 28. WCSO Item G37 – Laptop, MacBook Pro Model A1398 S/N C02NM0TRG3QN
 29. WCSO Item G38 – iPad, iPad from Waukesha School District
 30. WCSO Item G39 – iPad, iPad Silver Model A139, S/N DKV90EKDFJ0
 31. WCSO Item G40 – iPad, Model A1701 S/N DMPVR5YBHP51, Black Leather Case

32. WCSO Item G41 – Laptop, Dell Latitude 3390 2 IN 1 S/N B7TY1P2
33. WCSO Item G42 – Laptop, HP Spectre X360 S/N SCD93863SF
34. WCSO Item G43 – iPad, iPad Air in Colorful Case, Model AZ588 S/N HC3024WWK9
35. WCSO Item G44 – iPad, Rose Gold iPad, Model A1566, S/N DLXNKBNHG5W0
36. WCSO Item G45 – iPad, Rose Gold iPad, Model A1566, S/N DMQRTAH8GSW0
37. WCSO Item G46 – iPad, Silver iPad Model A2327 S/N L3DONRLL2W
38. WCSO Item G56 – Surveillance Camera, Yi Camera and SimpliSafe Sensor

Devices A1-A6, A8, A10, A12-A15, B1, B6, D1, D2, E3, E4, G1, G10, G14, G16-G21, G37-G46, and G56 (collectively the “Devices”) are currently located at the WCSO Computer Forensic Lab (CFL) located at 515 West Moreland Boulevard, Waukesha, WI 53188.

The applied-for warrant would authorize the forensic examination of the Devices for the purpose of identifying electronically stored data particularly described in Attachment B.

ATTACHMENT B

All records on each Device described in Attachment A that relate to violations of Title 18 U.S.C. § 371 (Conspiracy), Title 18 U.S.C. § 1751(c) and (d) (Presidential assassination), or Title 18 U.S.C. § 2332a(a)(2) (Weapons of mass destruction), including:

- a. Records and information relating to a conspiracy to carry out an attack on the President of the United States and or other political figures;
- b. Records and information relating to targets or potential targets of threats, harassment, or intimidation based on white supremacist ideology;
- c. Records and information relating to the organization known as the order of nine angles, Mortis Covenant, neo nazi or white supremacy ideology guiding or advocating means of carrying out acts violence or terrorism, including any communications;
- d. Records and information relating to communications, including the use of electronic communication services or systems or facilities of interstate commerce, to harass or intimidate another person for the purposes of eliciting acts to assist carrying out violence;
- e. Records and information relating to Casap's location at relevant times, and the location and identities of any accomplices;
- f. Evidence of who used, owned, or controlled the Devices at the time the things described in this warrant were created, edited, or deleted, such as logs, registry entries, configuration files, saved usernames and passwords, documents, browsing history, user profiles, email, email contacts, chat, instant messaging logs, photographs, and correspondence;

- g. Evidence of software that would allow others to control the Device, such as viruses, Trojan horses, and other forms of malicious software, as well as evidence of the presence or absence of security software designed to detect malicious software;
- h. Evidence of the lack of such malicious software;
- i. Evidence indicating how and when the Device was accessed or used to determine the chronological context of computer access, use, and events relating to crime under investigation and to the user;
- j. Evidence indicating the Device user's state of mind as it relates to the crime under investigation;
- k. Evidence of the attachment of or to the Device of or to other storage devices or similar containers for electronic evidence;
- l. Evidence of counter-forensic programs (and associated data) that are designed to eliminate data from the Device;
- m. Contextual information necessary to understand the evidence described in this attachment;
- n. Records of Internet Protocol addresses used;
- o. Records of Internet activity, including firewall logs, caches, browser history and cookies, "bookmarked" or "favorite" web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

As used above, the terms "records" and "information" include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

This warrant authorizes a review of electronic storage media and electronically stored information seized or copied pursuant to this warrant in order to locate evidence, fruits, and instrumentalities described in this warrant. The review of this electronic data may be conducted by any government personnel assisting in the investigation, who may include, in addition to law enforcement officers and agents, attorneys for the government, attorney support staff, and technical experts. Pursuant to this warrant, the FBI may deliver a complete copy of the seized or copied electronic data to the custody and control of attorneys for the government and their support staff for their independent review.